

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Tribal Mobility Fund Phase I Auction	)	AU Docket No. 13-53
Scheduled for October 24, 2013	)	

**COMMENTS OF AT&T**

In a March 29, 2013, public notice, the Wireless Telecommunications and Wireline Competition Bureaus (Bureaus) released a list of census blocks potentially eligible for Tribal Mobility Fund Phase I support based on whether the centroid of the census block has 3G or better wireless coverage.<sup>1</sup> The Bureaus provided commenters with the opportunity to challenge the served or unserved nature of the Commission-identified census blocks.<sup>2</sup> Attached to these comments, AT&T Inc. (AT&T), on behalf of its wholly-owned subsidiary AT&T Mobility LLC (AT&T Mobility), hereby provides the Commission with a list of 31 census blocks that the Bureaus identified as potentially eligible for Tribal Mobility Fund Phase I support but where, in fact, AT&T Mobility currently provides 3G or better service at the centroid of those census blocks.

The list of potentially eligible census blocks where AT&T Mobility currently provides 3G or better coverage at the centroid is attached as Appendix A. Maps showing AT&T

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<sup>1</sup> *Tribal Mobility Fund Phase I Auction Scheduled for October 24, 2013 – Comment Sought on Competitive Bidding Procedures for Auction 902 and Certain Program Requirements*, AU Docket No. 13-53, Public Notice, DA 13-323 (rel. March 29, 2013).

<sup>2</sup> *Id.* at ¶ 21 (“If commenters think certain blocks included in the list should not be eligible for support, they should indicate which blocks and provide supporting evidence.”).

Mobility's coverage in these areas are attached as Appendix B. The attached appendices are the result of an analysis performed by the AT&T Radio Access Network Geographic Information System (GIS) Team using census block boundaries and AT&T Mobility's Universal Mobile Telecommunications System (UMTS) coverage as generated by ATOLL. ATOLL is a propagation tool used by engineers to predict and model wireless coverage for design and display purposes. The analysis between the census blocks and AT&T Mobility's UMTS coverage was performed using MapInfo Professional GIS software. Census geographies were queried against the current AT&T Mobility UMTS footprint. Potentially eligible census blocks whose centroids are covered by AT&T Mobility's existing UMTS service are listed in Appendix A.

Respectfully Submitted,

/s/ Cathy Carpino  
Cathy Carpino  
Gary L. Phillips  
Peggy Garber

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May 10, 2013

Its Attorneys

# Appendix A

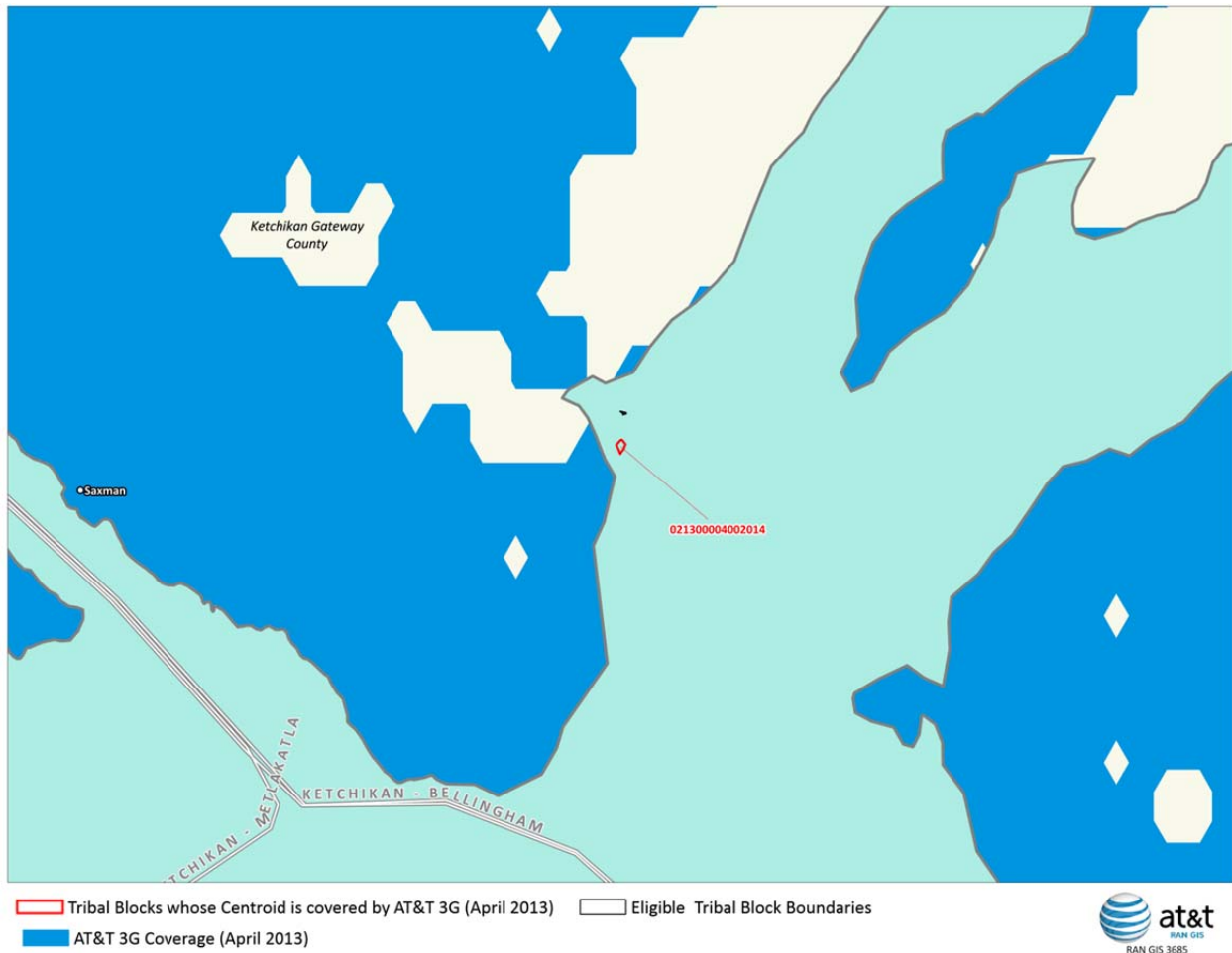
## Appendix A – List of Census Blocks Covered By AT&T Mobility

Item	Blocks with AT&T Mobility 3G or better Coverage (April 2013)	Proposed Item	State	County	Tract	Tribe
1	21300004002014	Ketchikan - AK	Alaska	Ketchikan Gateway Borough	02130000400	Ketchikan
2	22400001001460	Tanacross - AK	Alaska	Southeast Fairbanks Census Area	02240000100	Tanacross
3	60190064022228	Cold Springs - CA	California	Fresno County	06019006402	Cold Springs
4	221159501001057	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
5	221159501001235	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
6	221159501001261	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
7	221159501002020	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
8	221159501002021	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
9	221159501002022	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
10	221159501002023	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
11	221159501002024	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
12	221159501002025	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
13	221159501002027	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
14	221159501002028	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
15	221159501002029	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
16	221159501002030	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
17	221159501002032	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
18	221159501002033	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
19	221159501002035	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
20	221159501002036	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
21	221159501002049	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
22	221159501002059	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee
23	221159501005010	Four Winds Cherokee - LA	Louisiana	Vernon Parish	22115950100	Four Winds Cherokee

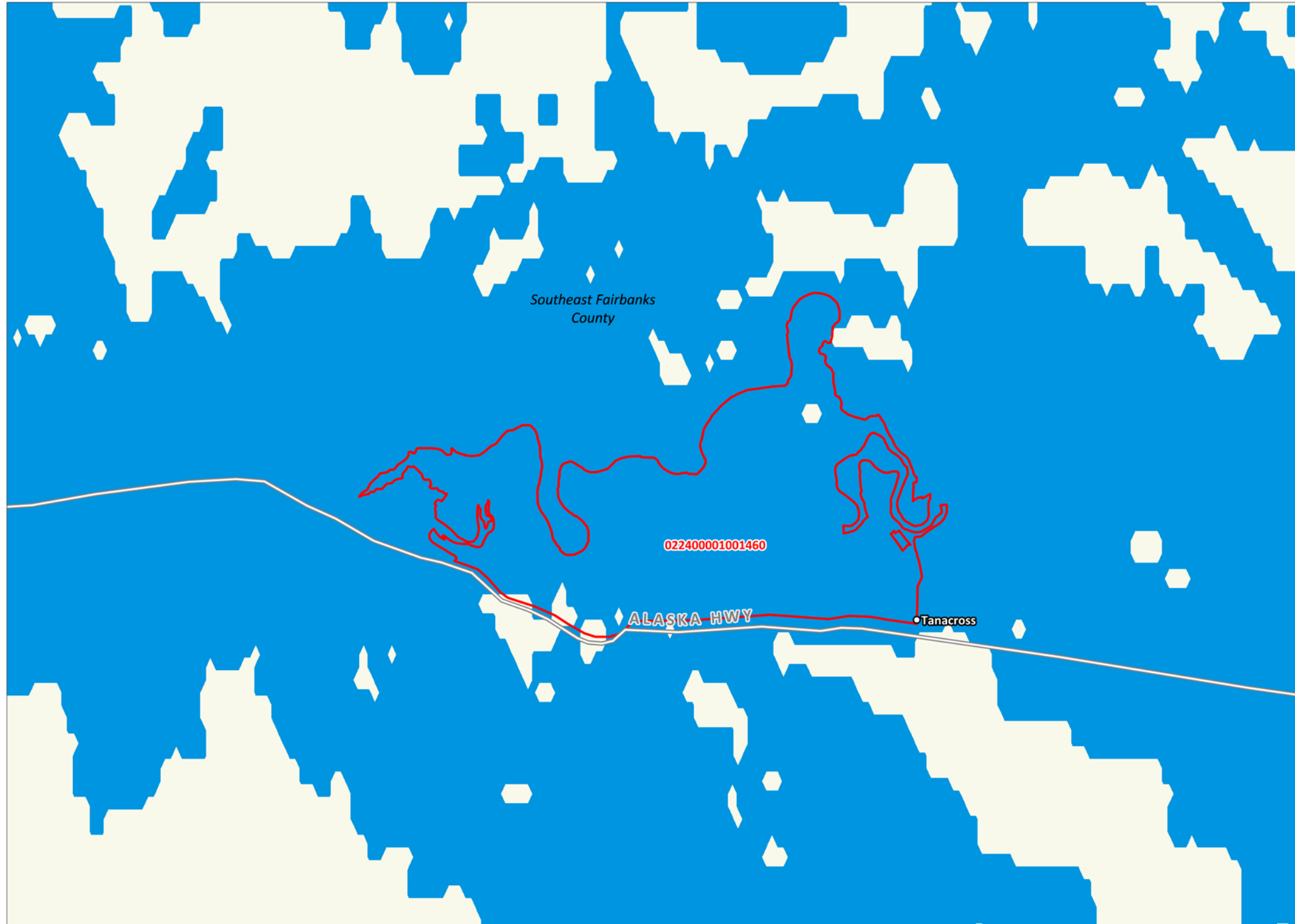
## Appendix A – List of Census Blocks Covered By AT&T Mobility

Item	Blocks with AT&T Mobility 3G or better Coverage (April 2013)	Proposed Item	State	County	Tract	Tribe
24	260339706003051	Bay Mills - MI - 2	Michigan	Chippewa County	26033970600	Bay Mills
25	360999508003001	Cayuga Nation - NY	New York	Seneca County	36099950800	Cayuga Nation
26	360999508003003	Cayuga Nation - NY	New York	Seneca County	36099950800	Cayuga Nation
27	380259622002315	Fort Berthold - ND	North Dakota	Dunn County	38025962200	Fort Berthold
28	380259622002884	Fort Berthold - ND	North Dakota	Dunn County	38025962200	Fort Berthold
29	410419518002060	Siletz - OR	Oregon	Lincoln County	41041951800	Siletz
30	530559601001117	Samish - WA - 1	Washington	San Juan County	53055960100	Samish
31	530579501001000	Samish - WA - 3	Washington	Skagit County	53057950100	Samish

# Appendix B



Note: This census block is on land per satellite views. However, AT&T Mobility normally uses water layers to limit displayed coverage to land coverage. The granularity and resolution of the water layer in this case overlaps beyond the shoreline layer to make it appear that the census block is over water (i.e., the light blue area), which it is not.





Southeast Fairbanks  
County

022400001001460

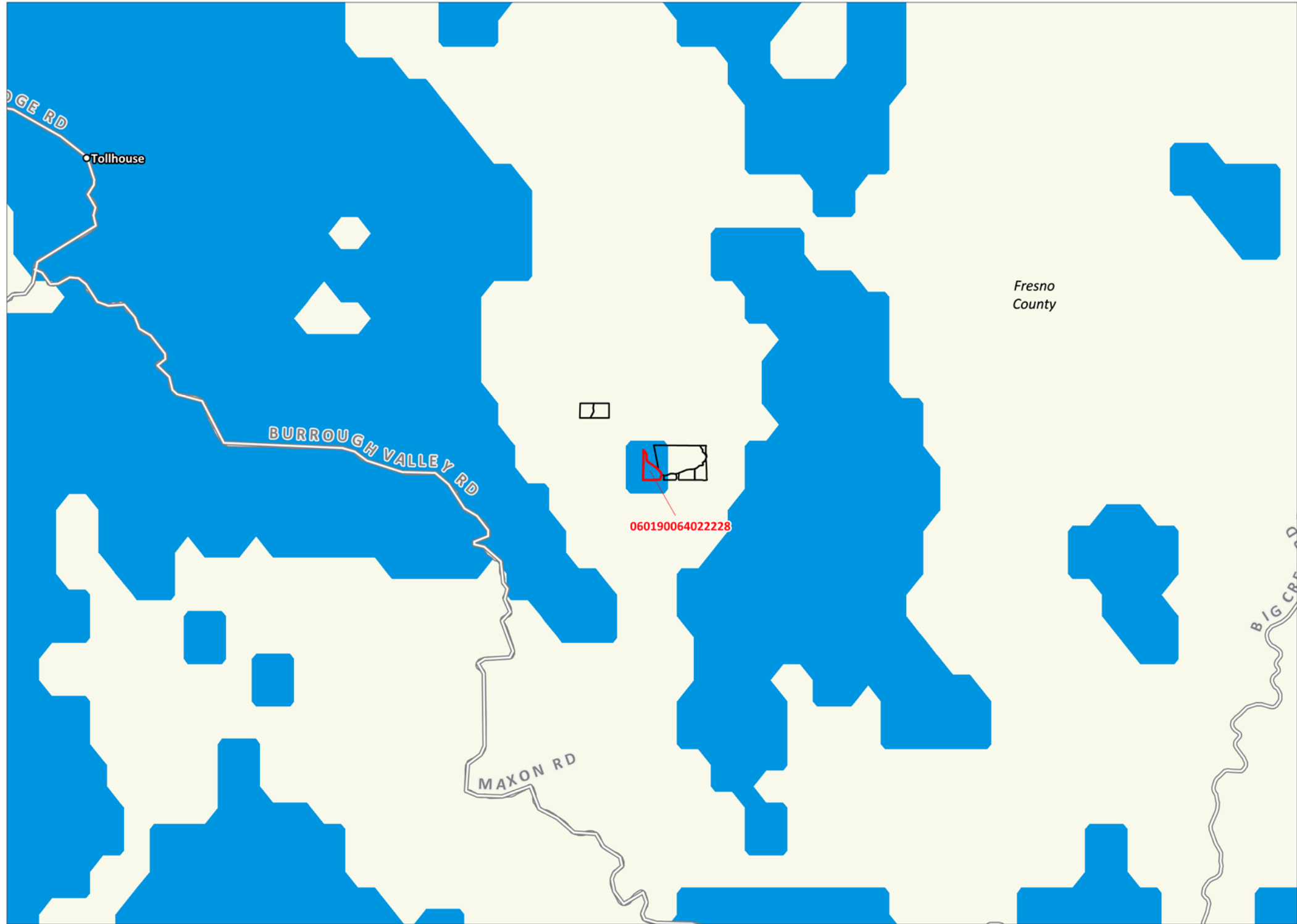
ALASKA HWY

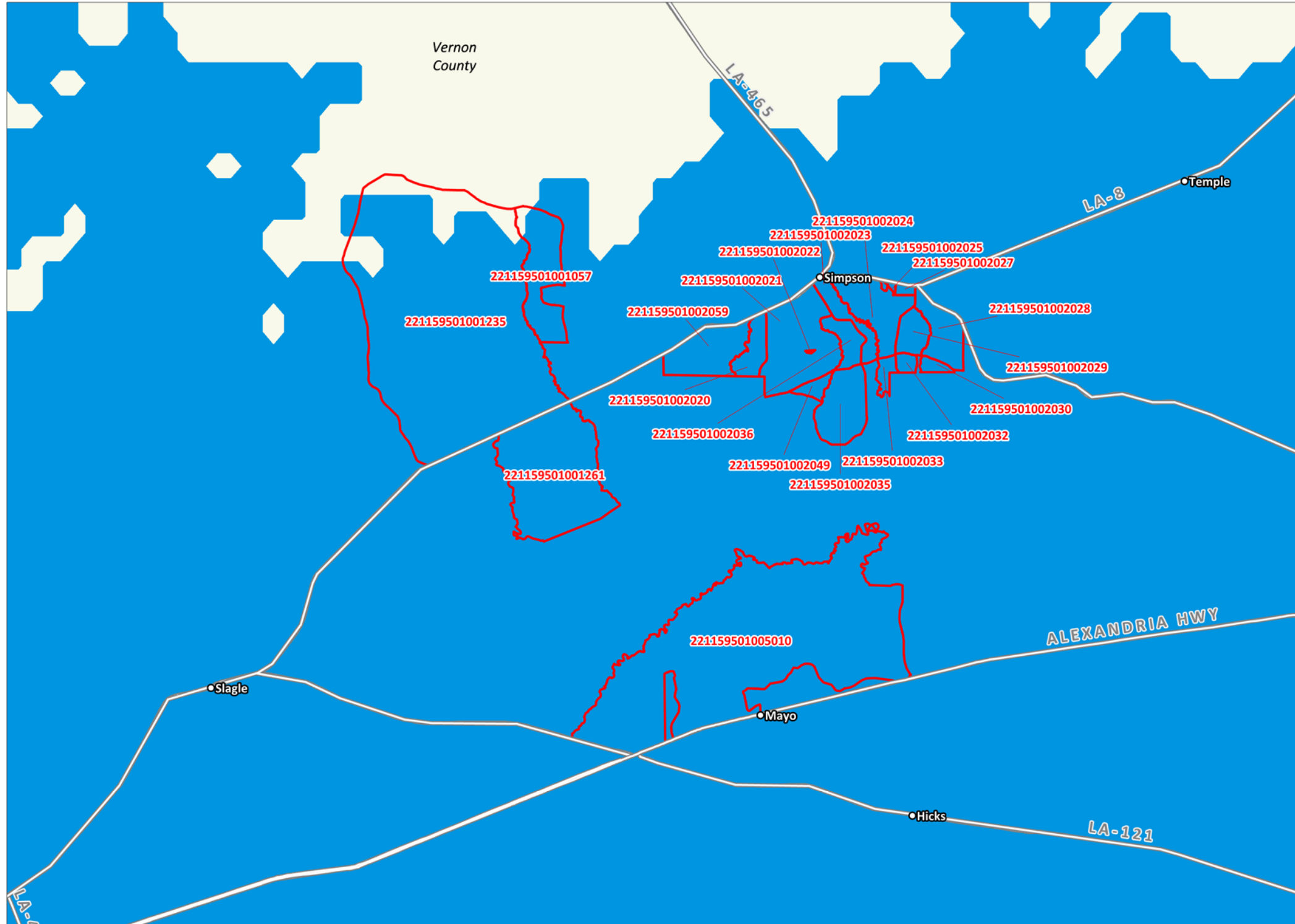
Tanacross


 Tribal Blocks whose Centroid is covered by AT&T 3G (April 2013)  Eligible Tribal Block Boundaries


 AT&T 3G Coverage (April 2013)






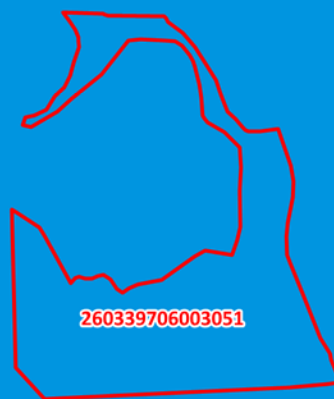


 Tribal Blocks whose Centroid is covered by AT&T 3G (April 2013)

 Eligible Tribal Block Boundaries

 AT&T 3G Coverage (April 2013)

Chippewa  
County

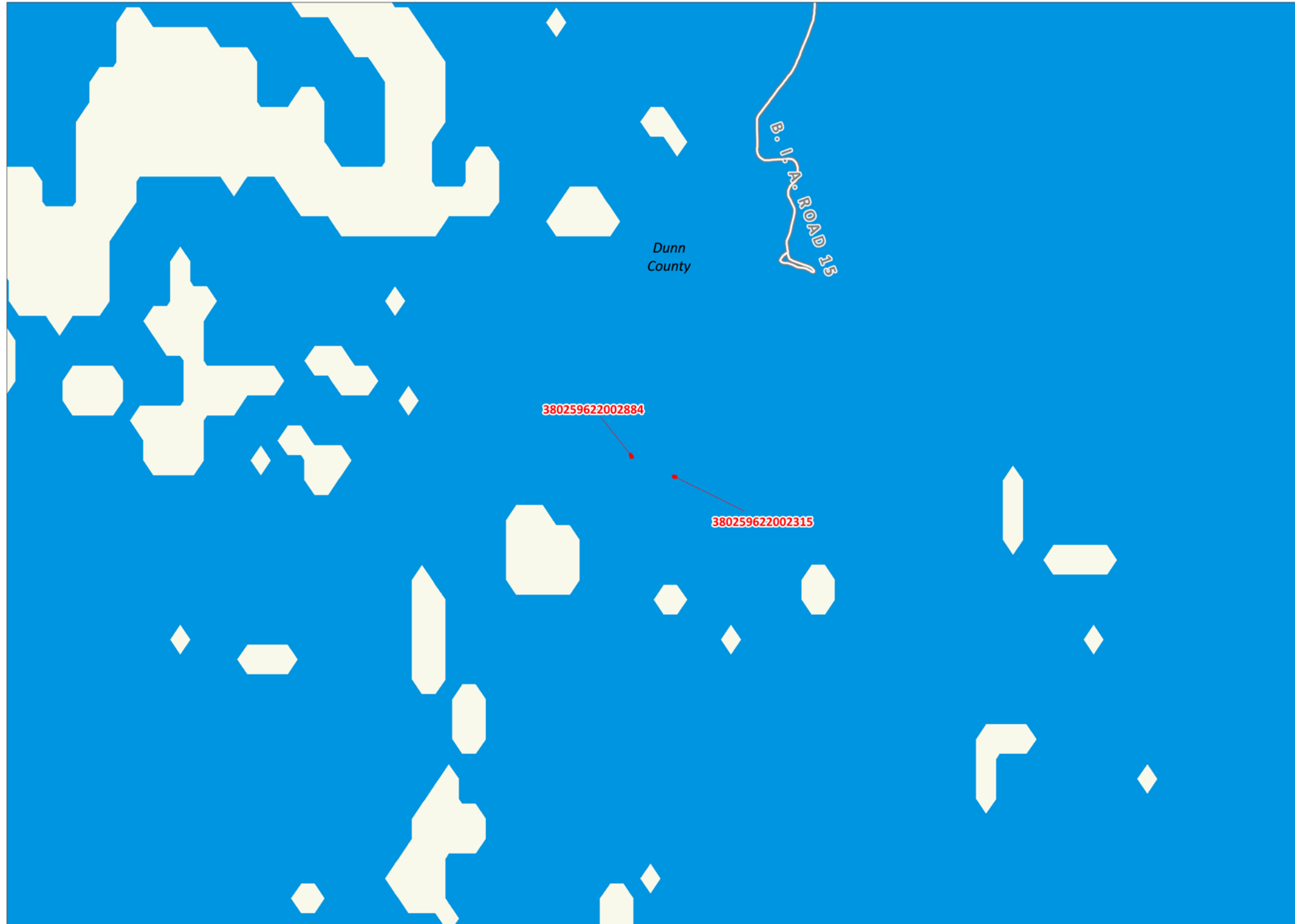


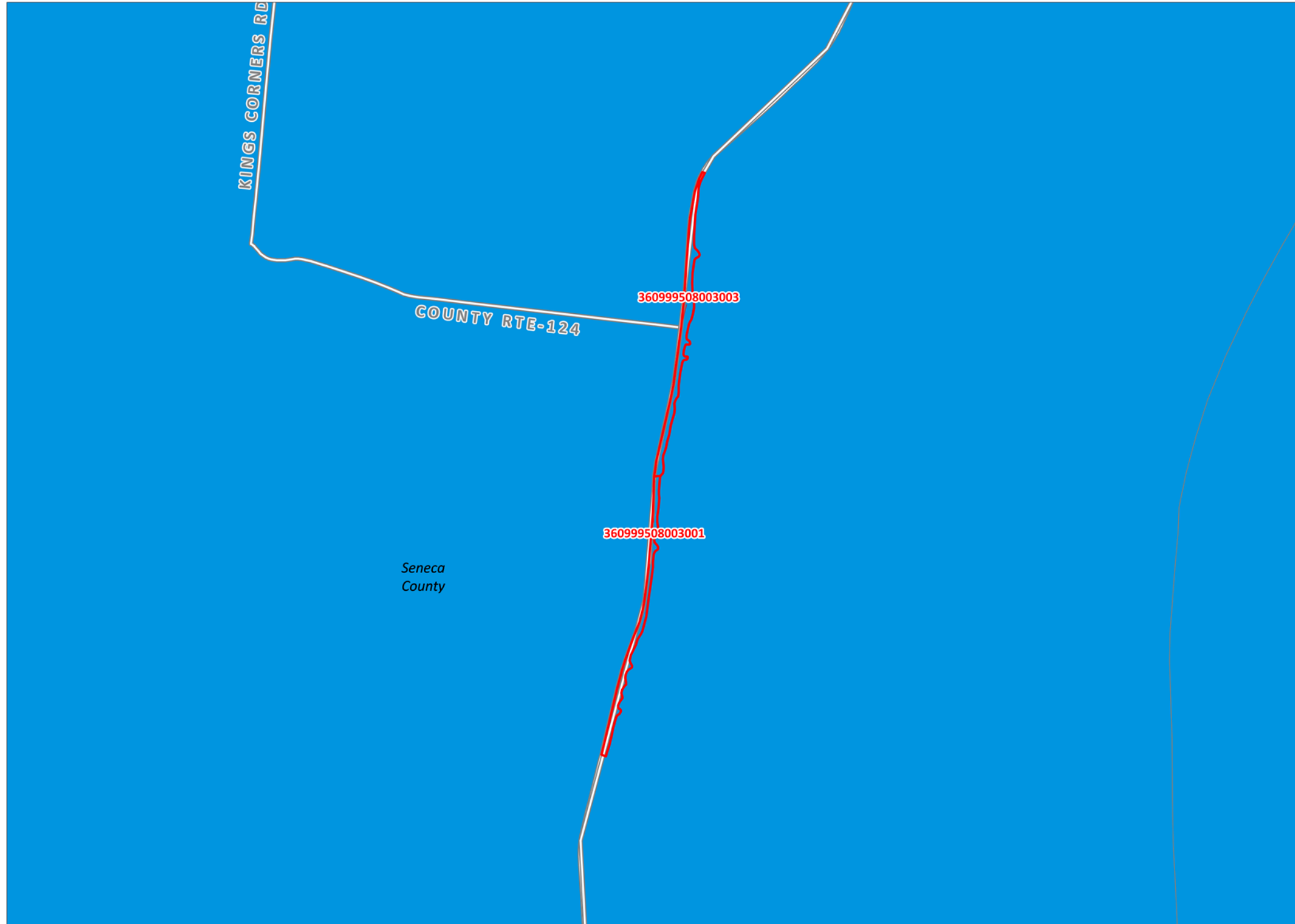
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
W LAKESHORE DR

 Tribal Blocks whose Centroid is covered by AT&T 3G (April 2013)  Eligible Tribal Block Boundaries

 AT&T 3G Coverage (April 2013)





 Tribal Blocks whose Centroid is covered by AT&T 3G (April 2013)     Eligible Tribal Block Boundaries

 AT&T 3G Coverage (April 2013)



Lincoln  
County

SE GAITHER ST

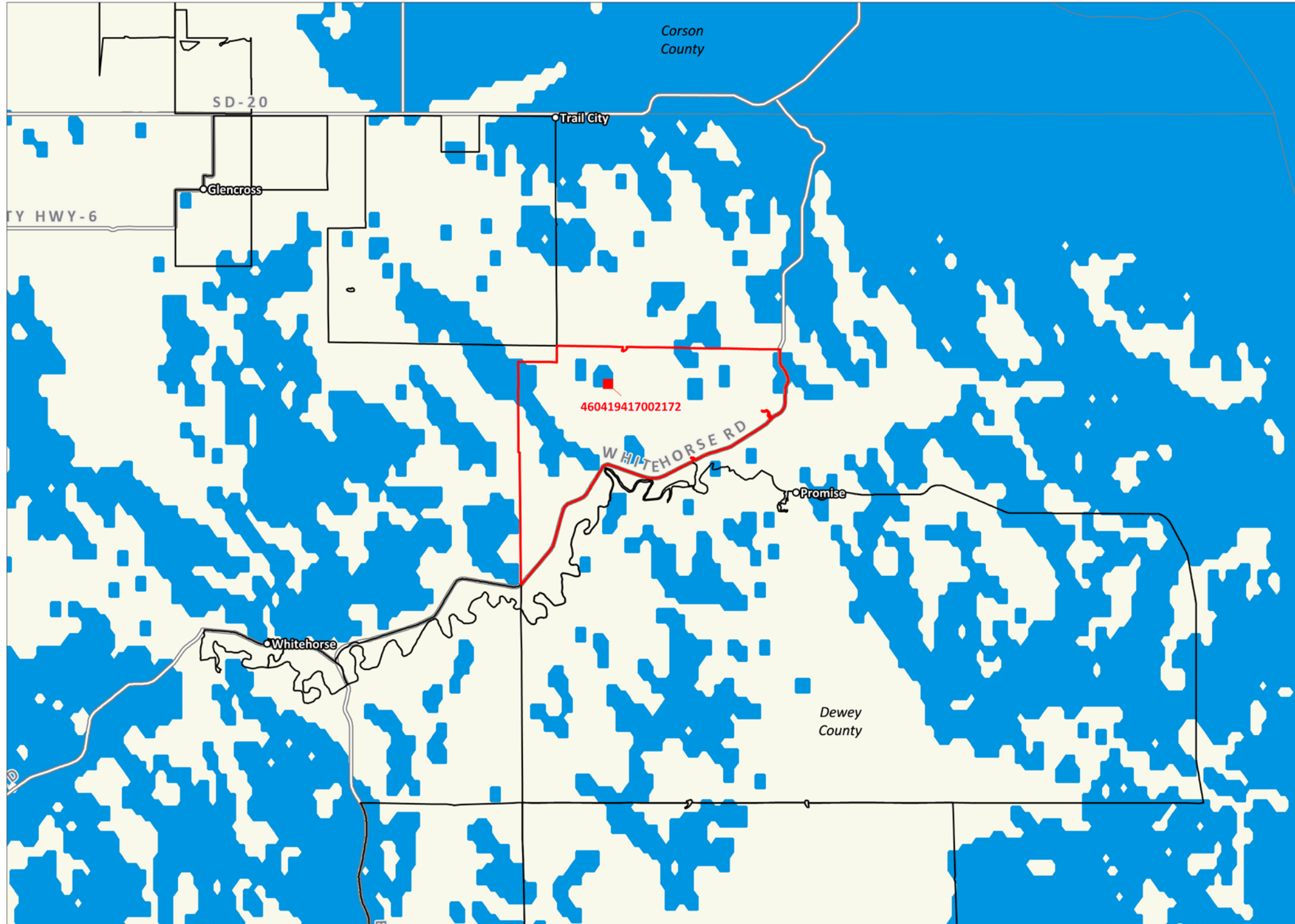
SILETZ HWY



Siletz

LOGSDEN RD

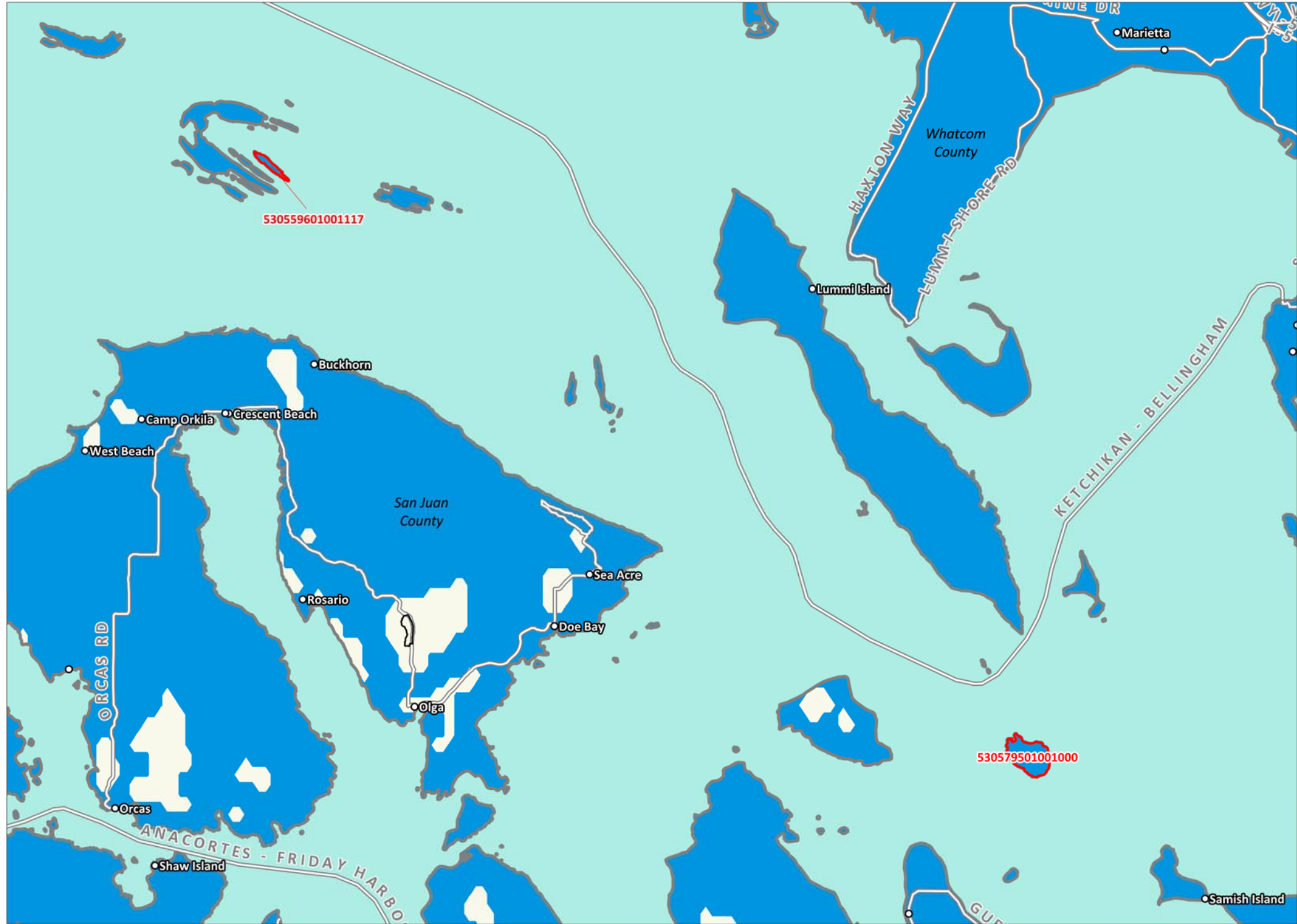
SAMS CREEK

410419518002060



 Tribal Blocks whose Centroid is covered by AT&T 3G (April 2013)  Eligible Tribal Block Boundaries

 AT&T 3G Coverage (April 2013)



 Tribal Blocks whose Centroid is covered by AT&T 3G (April 2013)  Eligible Tribal Block Boundaries

 AT&T 3G Coverage (April 2013)

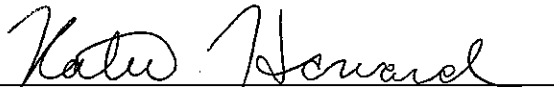


# Appendix C

## Appendix C

I, Katie Howard, declare under penalty of perjury, the following:

1. I am a Senior Radio Access Network Engineer employed by AT&T Mobility Services LLC, a subsidiary of AT&T Mobility LLC ("AT&T Mobility"), which is a wholly owned subsidiary of AT&T Inc.
2. In this capacity, I oversaw the analysis supporting the attached *Comments of AT&T in Tribal Mobility Fund Phase I Auction 902*, AU Docket No. 13-53.
3. Our analysis determined that the 31 Census Blocks ("CBs") identified in Appendix A are covered at the centroid by AT&T Mobility. In order to make this determination, AT&T Staff retrieved the latest list of potentially eligible CBs, imported the list in MapInfo and performed GIS analysis comparing the CB list (centroid) to the latest information on AT&T Mobility Coverage. In this analysis, AT&T Mobility engineering staff treated areas as "covered" by AT&T Mobility only if signal strength was sufficient to provide 3G coverage or better (i.e., UMTS, HSPA+, and LTE technologies).
4. I have read the foregoing comments and reviewed the appendices. I have personal knowledge of the facts and the representations set forth herein, and believe them to be true and accurate.



Katie Howard

5-18-2013

Date